

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

FRANCISCA ARIAS, CHERIE LYN  
COWELL, PATRICIA KOSTAK,  
CRISTINA LINDNER, JOHANA PENA,  
RAVEN VENTURA, NICOLE MORTON,  
JENNIFER MATTISON, DERRICK  
BILLINGS, and ANGELA PIROZZI,

Plaintiffs,

v.

AMERICAN NEIGHBORHOOD  
MORTGAGE ACCEPTANCE COMPANY  
LLC, D/B/A ANNIEMAC HOME  
MORTGAGE, FAMILY FIRST FUNDING,  
LLC, GABRIEL GILLEN, an Individual,  
NEUSA GILLEN, an Individual, and SCOTT  
WEIKEL, an Individual,

Defendants.

**DEFENDANT FAMILY FIRST FUNDING,  
LLC NOTICE OF JOINDER IN MOTION  
TO ENFORCE SETTLEMENT BY  
DEFENDANTS AMERICAN  
NEIGHBORHOOD MORTGAGE  
ACCEPTANCE COMPANY LLC, D/B/A  
ANNIEMAC HOME MORTGAGE,  
GABRIEL GILLEN AND NEUSA GILLEN**

Civil Action No. 3:23-cv-01226-RK-JBD

**TO ALL ATTORNEYS OF RECORD FOR ALL PARTIES**

**PLEASE TAKE NOTICE** that Defendant Family First Funding, LLC (“FF”) hereby joins in and adopt the Motion to Enforce Settlement (hereafter referred to as the “Motion”) by defendants American Neighborhood Mortgage Acceptance Company, LLC, d/b/a AnnieMac Home Mortgage (Dkt. 96) and by defendants Gabriel Gillen and Neusa Gillen (Dkt. 98) (collectively, “Defendants”), which Motion is currently returnable on May 19, 2025., or as soon thereafter as counsel may be heard, before the Honorable J. Brendan Day, United States Magistrate Judge for the United States District Court for the District of New Jersey located at the Martin Luther King Building and United States Courthouse, 402 East State Street, Trenton, New Jersey 08608 for the entry of an Order granting Defendants’ Motion.

FF joins the Motion on grounds that the parties entered into a valid and enforceable settlement agreement at the settlement conferenced held on December 17, 2024. In joining the Motion, FF adopts and incorporates by reference as though fully set forth herein, the contents of the Motion, the legal arguments and authorities cited in support thereof, the accompanying declarations, memorandums of law, exhibits, and all pleadings annexed to the Motion, as well as the requests for relief made by Defendants.

FF also reserves the right to present additional briefing and oral argument at the hearing on the Motion and this Joinder.

Dated: New York, New York  
April 25, 2025

Respectfully submitted,

GORDON REES SCULLY  
MANSUKHANI LLP

By: /s/ Francis J. Giambalvo  
Francis J. Giambalvo  
One Battery Park Plaza, 28<sup>th</sup> Floor  
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*Attorneys for Family First Funding, LLC*

TO: All Counsel of Record (via ECF)